This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

16/11 Date 3/24/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely;

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 031 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Two Eight-Inch Diameter Rounds

Site ID:

031

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

-northeast

Site 031 is a site containing two small 8-in. diameter inert military rounds located on an unmarked road heading northwest from Lincoln Blvd about 7.2 miles northeast of the Naval Reactor Facility (NRF) turnoff. NRF is the closest INEEL facility. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (GPS coordinates are

The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Site investigations revealed that Site 031 consists of two military rounds likely generated by early naval artillery testing during the 1940s at the INEEL. The two rounds are 1 ft long by 8 in. in diameter, rusted, and weathered. According to the INEEL Environmental Restoration Environmental Safety and Health Quality Assurance (ER ESH&QA) explosives expert, the rounds are inert and pose no risk.

There is no evidence of discolored soil or loss of vegetation near or around the two rounds. There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. The ground surface shows well established native grasses and sagebrush. The description of the site conditions is based on recent site investigations and interviews; no field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with an INEEL ER ESH&QA explosives expert revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 031 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides and other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY - Other Decision Drivers:

No other decision drivers are apparent for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge of naval artillery testing at the INEEL, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located on a unmarked road heading northwest from Lincoln Blvd about 7.2 miles northwest of the NRF turnoff. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. The rounds are inert and pose no risk to human health or the environment.

Signatures:	200 bleer		# Pages:	16	Date:	8/16/01
Prepared By: N	larilyn Raarmann	DOE W	AG Manager	•- -		
Approved By:	wild Hohr 9-300	Indepen	dent Reviev	N:Sev	47,6	9-C9-C9

DECISION STATEMENT
(DOE RPM)

Date Received: ///9/05

Disposition:

The military ordnance that is site 631 have been removed during the 2008/4 ordnance disposition.

No further action 13 require

Date:1/14/65-# Pages:16Name:KathlanHuinSignature:Inthlan5 Hain

DECISION	STATEMENT
(EPA	A RPM)

5,te-031

Date Received:

Disposition:

EPA concurs that these rounds

should be classified as no action.

However, EPA recomments DOE

pick up these rounds under the

land lard progress so these rounds

are removed from the future

public access.

Date: 9-23-04	# Pages: 16
Name: Dennis Falls	Signature:

DECISIO	N STA	TEMENT
(IE	EQ RP	'M)

Date Received:

Disposition:

Site 031

Site 031 is the location for two inert 8-inch rounds located about 7.2 miles northeast of the NRF turnoff from Lincoln Boulevard. The descriptions in the text place these rounds on an unmarked road heading northwest from Lincoln Boulevard and northwest of the NRF turnoff. The description of the location for the site requires correction or the map requires correction.

These rounds resulted from naval testing during the 1940s. The site ordnance expert has stated these rounds are inert and was never fused. The potential for explosive contaminated soil to exist near these rounds does not exist. The text answers the questions posed EPA regarding the potential for soil contamination and the status of the fuse in these rounds.

The State recommends this site as a No Further Action site but the location description requires correction.

Date:	U (4 SM	\mathcal{G}_{i}	2004	# Pages: 16	
Name:	\mathcal{J}_{arr}		Koch	Signature: Jary J. John	

PROCESS/WASTE V	VORKSHEET	
SITE ID: 031	PROCESS:	Two inert eight-in Diameter Rounds
	WASTE:	INEEL operations (U.S.Navy)
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Two artillery rounds resulting from naval testing during the 1940s at the INEEL.	Two inert eight-in. diameter military rounds that were fired during artillery testing and abandoned in place	Artifact: Two artillery rounds Location:
		On an unmarked road heading northwest from Lincoln Blvd about 7.2 miles northwest of the NRF turnoff.
		Description: Two inert eight-in. diameter military rounds abandoned in place by INEEL (U.S. Navy) operations. The rounds are inert and pose no risk.

CONTAMINANT WORKSHEET

SITE ID:

031

PROCESS: Two inert eight-in. Diameter Rounds

	WASTE:	INEEL operations (U.S	S.Navy)		
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/ low)	Col 9 Overall Reliability (high/med/ low)
None	Soil	None	Not Applicable	Low	High
		,			

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?			
Block 1	Answer:			
located on an NRF turnoff.	ists of two inert eight-in. diameter military rounds abandoned in place. The site is unmarked road heading northwest from Lincoln Blvd about 7.2 miles northwest of the NRF is the closest INEEL facility. The debris resulted from U.S. Navy testing ring and post-World War II.			
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)			
	An interview with an INEEL ER ESH&QA explosives expert confirmed the age of the rounds, that they are inert, weathered, that they contain no hazardous constituents and pose no risk.			
Block 3	Has this INFORMATION been confirmed? ⊠ Yes □ No If so, describe the confirmation. (check one)			
	Interviews, site investigations, and historical research confirm the nature and age of artifacts. Photographs confirm the conditions at the site.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)			
	2,5 Documentation about Data Disposal Data Disposal Data DA Data S Safety Analysis Report Surrence Report Dad Report Initial Assessment Well Data			
Other				

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?
Block 1	Answer:
	ists of two inert eight-in. diameter military rounds located on an unmarked road west from Lincoln Blvd about 7.2 miles northwest of the NRF turnoff.
	esulted from naval testing operations during and post-WWII. The rounds were place following testing activities in the 1940s.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
	vith an INEEL ER ESH&QA explosives expert revealed that Site 031 consists of two s that are old, weathered, inert, contain no hazardous constituents, and pose no risk.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
	e investigations, and historical research confirm the nature and age of artifacts. confirm the conditions at the site.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
No Available Information Analytical Data Analytical Data Disposal Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data Disposal Data Disposal Data DAD Report Initial Assessment Well Data Construction Data	

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.	
Block 1	Answer:	
There is no evidence that a source exists at Site 031. The artillery rounds were left in place following naval testing operations during and post-WWII. The ER ESH&QA explosives expert determined that these rounds were inert and pose no risk. There is no evidence of hazardous constituents, disturbed vegetation, stained or discolored soil, or odors present.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
related to nav	tions conducted by an ER ESH&QA explosives expert confirmed the debris was all testing operations and was left in place during the late 1940s. Site investigations sual evidence of hazardous constituents.	
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
	e investigations, and historical research confirm the nature and age of the debris. confirm the type of debris and current conditions at the site.	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
No Available Information Anecdotal Historical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data Disposal Data OA Data D&D Report Initial Assessment Well Data Construction Data		

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?
Block 1	Answer:
hazardous co established. It	sual evidence of migration at Site 031. Site investigations revealed no evidence of nstituents, disturbed, stained or discolored soil areas, or odors. Vegetation is well nvestigations confirmed that the inert artillery rounds resulted from naval testing ore than fifty years ago at the INEEL and pose no risk.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
~	tions and photographs of the site show no staining or discolored soil, and that well established; therefore giving no indication of disturbance or the presence of .
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
This informati and photogra	ion was confirmed through site inspections, interviews with ER ESH&QA personnel, phs.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2,5 Documentation about Data Disposal Data Disposal Data Disposal Data DA Data DA Data DAD Report DAD Report Data DECUMENTS DAD REPORT DATE DATE DECUMENTS DATE

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?				
Block 1	k 1 Answer:				
There is no expected pattern of potential contamination because there is no evidence of hazardous substances at this site. There is no visual evidence of stained or discolored soil in the area, odors, or evidence of disturbed vegetation. The debris resulted from Naval artillery testing in the 1940s. The pattern of hazardous constituents (organics, metals, radionuclides, etc.) cannot be estimated without further field screening or soil sampling; however, because of the inert nature, age and weathered condition of the debris it is highly unlikely that contaminants would be present at levels above risk-based limits.					
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)					
This information was obtained from site investigations and interviews with an INEEL ER ESH&QA explosives expert. Photographs indicate that the soil is not stained or discolored, and vegetation near the debris is well established.					
Block 3	Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
The information	on was confirmed through site inspections, interviews and photographs.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)					
	2,5 Documentation about Data Disposal Data Capacita QA Data QA Data Safety Analysis Report Capacita D&D Repor				

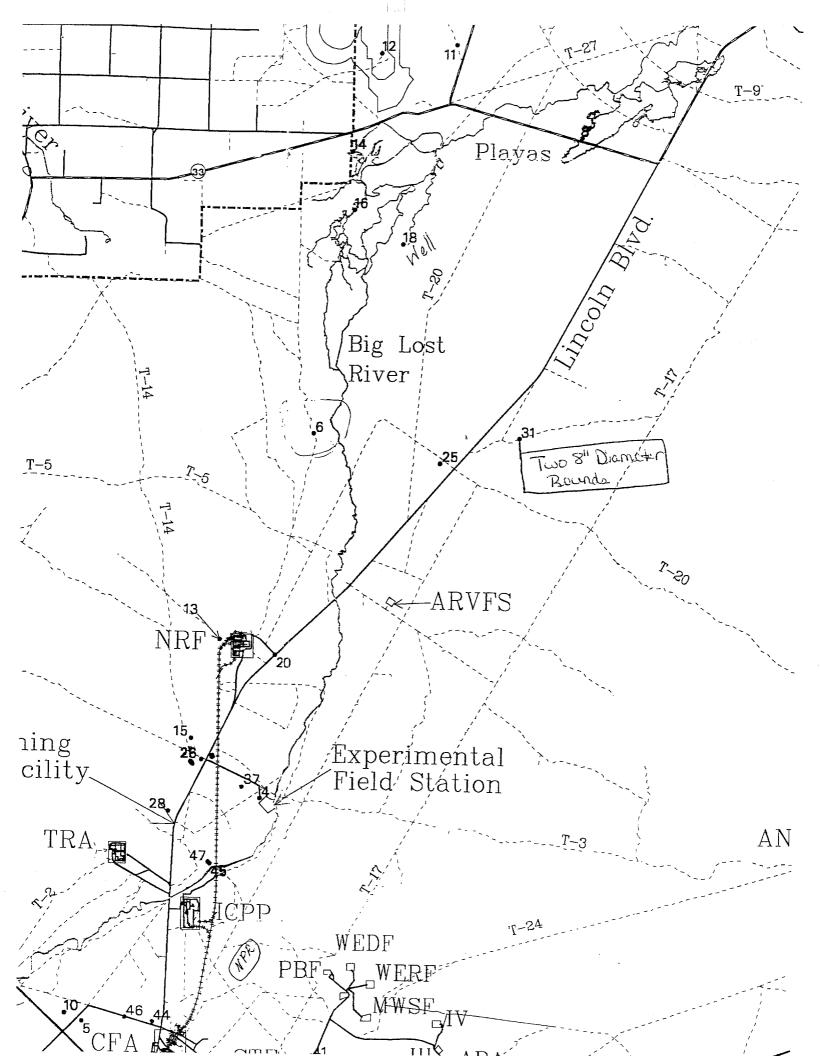
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.				
Block 1	Answer:				
Investigations and photographs of the area indicate that Site 031 consists of two inert eight-in. diameter military rounds. There is no evidence of a source at this site or contaminated region to estimate because there is no evidence of hazardous or radioactive materials. Interviews with an INEEL explosives expert revealed that the rounds are inert and contain no hazardous constituents, and pose no risk to human health or the environment.					
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from site investigations and interviews conducted with an INEEL explosives expert. The interviews and investigations gave no indication that the debris contains anything that would pose a risk.					
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, interviews, photographs and historical research of naval operations at the INEEL during the 1940s.					
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)				
	2,5 Documentation about Data Disposal Data Disposal Data DA DA Data DA DA DATA				

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.				
Block 1	Answer:				
The estimated quantity of hazardous substances/constituents at this site is near zero, because there is no evidence of any hazardous or radioactive materials present. This site consists of two weathered, inert, 8-in. diameter artillery rounds that resulted from naval testing during and post-WW II. There is no evidence of hazardous constituents that might pose a risk to human health or the environment.					
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from site investigations and interviews conducted with an INEEL explosives expert. The interviews and investigations confirmed that the debris does not pose a risk. Photographs show that vegetation is undisturbed and well established.					
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, interviews, historical research, and photographs.					
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)					
	2,5 Documentation about Data Disposal Data Disposal Data DA DA Data DA				

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.				
Block 1	Answer:				
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. An INEEL ER ES&HQA explosives expert confirmed that the debris was inert, contained no hazardous constituents, and resulted from naval artillery testing activities in the 1940s. There is nothing to indicate that hazardous substances are present at the site.					
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low				
	Explain the reasoning behind this evaluation. (check one)				
This evaluation is based on interviews, site visitations, and photographs of the area. There is no visual evidence of hazardous constituents. This site shows no soil staining or discoloration. Vegetation around the debris is well established.					
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, historical research, interviews and photographs.					
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)				
	2,5 Documentation about Data Disposal Data CAN DATA COLUMENTATION DESCRIPTION DES				

REFERENCES

- 1. DOE, 1992, "Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390"
- 2. Interview with Hanceford Clayton, INEEL ESH&QA explosives expert, April 11, 2001.
- 3. Photographs of Site 031: 99-465-2-16, 99-465-2-17, 99-465-2-18, 99-465-2-20.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.



DRAFT

Attachment A

Photographs of Site #031



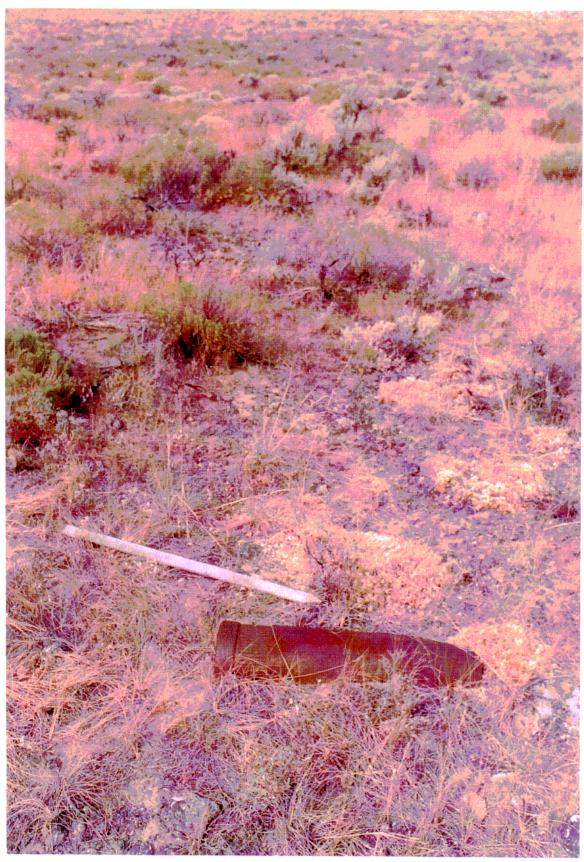
Site: 031 Two 8" Diameter Rounds (99-465-2-16)



Site: 031 Two 8" Diameter Rounds (99-465-2-17)



Site: 031 Two 8" Diameter Rounds (99-465-2-18)



Site: 031 Two 8" Diameter Rounds (99-465-2-20)

Attachment B

Supporting Information for Site #031

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Par	t A – To Be Completed By Observer						
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877					
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324					
2.	Site Title: 031, Two 8" Diameter Rounds						
3.	Describe the conditions that indicate a possible inactive or unreported condition, amount or extent of condition and date observed. A location survey points or global positioning system descriptors shall be include names or location descriptors for the waste site.	on map and/or diagram identifying the site against controlled ed to help with the site visit. Include any known common					
	Two rounds are located on an unmarked road heading northwest from Lincoln Blvd about 7.2 miles north of the NRF turnoff. During the July 1999 site visit the observed rounds were 8 inches in diameter. Hanceford Clayton, ER ESH&Q, has investigated these rounds and determined they have been defused. The GPS coordinates of the site are The reference number for this site is 031 and can be found on the summary map as provided.						
Pai	rt B – To Be Completed By Contractor WAG Manager						
4.	Recommendation:	,					
	This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO. WAG:						
	This site DOES NOT meet the requirements for an inactive wast included in the INEEL FFA/CO Action Plan.	e site, DOES NOT require investigation and SHOULD NOT be					
5.	Basis for the recommendation:						
	The conditions that exist at this site indicate the potential for an inaction Disturbance of Suspected Inactive Waste Sites.	ive waste site according to Section 2 of MCP-3448 Reporting					
	The basis for recommendation must include: (1) source description; concern; and (4) descriptions of interfaces with other programs, as a	(2) exposure pathways; (3) potential contaminants of pplicable (e.g., D&D, Facility Operations, etc.)					
6.	Contractor WAG Manager Certification: I have examined the propos believe the information to be true, accurate, and complete. My recon	ed site and the information submitted in this document and nmendation is indicated in Section 4 above.					
Na	me: Signature:	Date:					



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION:

Site 031 Track 1 Decision Documentation Package, OU 10-08: Two Eight-Inch Diameter Rounds (DOE/ID

10939)

DATE:	TE: April 3, 2002 REVIEWER: IDEQ									
ITEM NUMBER	SECTION NUMBER	PAGE NUMBER		COMMENT		RESOLUTION				
COMMEN	COMMENTS									
1		1, 2, 8, and 13	different meaning. The correct term to explain why	id 13 incorrectly refer to "diffused ag than what the explosives expert is 'defuse'. Please correct. Also, an inert round was fused, hence de leviate future questions. The conc	did to the rounds. a sentence or two fused by your	Comment incorporated. We contacted the site explosives expert who said the rounds were not defused, but were never fused. We have changed the document to remove mention of the rounds being previously defused.				
2		2, 8, 9	Page 1 states no	d last page refer to different direct rtheast of NRF and other statement sistent direction for clarity, northe te.	its are north.	Comment incorporated.				